

Federal Defenders  
OF NEW YORK, INC.

Tamara L. Giwa  
Executive Director

**VIA EMAIL & ECF**

The Honorable Philip M. Halpern  
United States District Judge  
Southern District of New York  
300 Quarropas Street,  
White Plains, NY 10601

Application granted. The status conference scheduled for June 10, 2025 is adjourned to July 21, 2025 at 12:00 p.m. in a courtroom to be determined. The Government shall file a proposed order to exclude time under the Speedy Trial Act. The Clerk of Court is respectfully directed to terminate the pending letter-motion (Doc. 28).

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
June 9, 2025

Southern District

Room 124  
NY 10601  
(917) 948-5109

L. Brown  
in-Charge

Re: *United States v. Miguel Munoz*, 25-cr-60 (PMH)

Dear Honorable Judge Halpern:

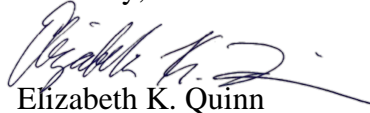
I write to respectfully request a 45-day adjournment of the status conference currently scheduled for Tuesday, June 10, 2025, at 12:00 p.m. My understanding is the Court has availability on July 21, 2025, at 12:00 p.m. and that date and time work for the parties.

Since our last appearance, I submitted an application on Mr. Munoz's behalf for the Youth Adult Opportunity Program (YAOP). I learned last week that Mr. Munoz was not accepted into that program. Therefore, both he and I require additional time to decide how he wishes to resolve that case and to engage with the government about possible resolutions. Therefore, I'm respectfully requesting that the matter be adjourned for approximately 45-day to achieve those ends. I have conferred with the government, through Assistant United States Attorney Jorja Kanuer, and she does not object to this request.

I also have no objection to the exclusion of time for this adjournment under 18 U.S.C. § 3161(h)(7)(A) as the ends of justice served by granting such a continuance outweigh the best interests of the public and Munoz in a speedy trial. Specifically, the failure to grant such a continuance would deny Mr. Munoz reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

Therefore, Mr. Munoz respectfully requests his status conference be adjourned to July 21, 2025, at 12:00 p.m., and that time be excluded through the next appearance.

Sincerely,



Elizabeth K. Quinn

cc: AUSA Jorja Knauer